

Rosemary J. Bruno
Christopher J. Dalton
Daniel Z. Rivlin
BUCHANAN INGERSOLL & ROONEY PC
Incorporated in Pennsylvania
550 Broad Street, Suite 810
Newark, New Jersey 07102
973-273-9800
Attorneys for Defendants,
BMW of North America, LLC and
Bayerische Motoren Werke Aktiengesellschaft

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ROBERT GRAY, and MAKRUM GEORGE,
individually, and on behalf of a class of
similarly situated individuals,

Plaintiffs,
v.

BMW OF NORTH AMERICA, LLC, and
BAYERISCHE MOTOREN WERKE
AKTIENGESELLSCHAFT,

Defendants.

: Civil Action No. 2:13-cv-3417(WJM)(MF)

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: **DECLARATION OF DANIEL Z.
RIVLIN IN RESPONSE TO
PLAINTIFFS' MOTION FOR FEES**

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DANIEL Z. RIVLIN, of full age, hereby declares under penalty of perjury as follows:

1. I am an attorney duly licensed to practice before the courts in the States of New Jersey and New York and a shareholder in the firm of Buchanan Ingersoll & Rooney PC. All the facts set forth below are personally known to me and I would so testify if called as a witness in this action.

2. Buchanan Ingersoll & Rooney PC is counsel of record for BMW of North America, LLC (“BMW NA”) and Bayerische Motorenwerk Aktiengesellschaft (“BMW AG”) in

the above-captioned action pending in the United States District Court for the District of New Jersey.

3. As of June 22, 2017 (three days after the Claim Filing Deadline) 2,315 claim forms were timely received by the Settlement Claims Administrator. A true and correct copy of the June 22, 2017 Weekly Case Status Report from the Settlement Claims Administrator is attached as Exhibit A.

4. As of July 5, 2017, (over two weeks after the Claim Filing Deadline) 2,492 claim forms were timely received by the Settlement Claims Administrator, and an additional 57 claim forms were untimely. A true and correct copy of the July 5, 2017 Weekly Case Status Report from the Settlement Claims Administrator is attached as Exhibit B.

Dated: July 6, 2017

/s/ Daniel Z. Rivlin
Daniel Z. Rivlin
Buchanan Ingersoll & Rooney PC